

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

DR. SHIVA AYYADURAI,
Plaintiff,

v.

WILLIAMS FRANCIS GALVIN, MICHELLE)
K. TASSINARI, DEBRA O'MALLEY, AMY)
COHEN, NATIONAL ASSOCIATION OF)
STATE ELECTION DIRECTORS, allegedly)
in their individual capacities, and WILLIAM)
FRANCIS GALVIN, in his official capacity as)
Secretary of State for Massachusetts.)
Defendants.)

Civ. No. 20-cv-11889

**THE NATIONAL ASSOCIATION OF STATE ELECTION DIRECTORS AND AMY
COHEN'S RESPONSE TO MAY 21, 2021 ORDER**

In accordance with the Court's May 21, 2021 Order (Dkt No. 122), Defendants the National Association of State Election Directors and Amy Cohen state that they do not believe that disqualification is required pursuant to 28 U.S.C. § 455(a) or (b) based on the Court's association with Felicia Ellsworth as stated at the May 20, 2021 hearing, and in any event waive any such grounds for disqualification pursuant to 28 U.S.C. § 455(e).

Dated: May 27, 2021

Respectfully submitted,

*For the National Association of State Election
Directors and Amy Cohen*

/s/ Nolan J. Mitchell

Nolan J. Mitchell (BBO #668145)
nolan.mitchell@nelsonmullins.com
Nelson Mullins Riley & Scarborough LLP
One Financial Center
Boston, MA 02111
Tel. (617) 217-4700
Fax (617) 217-4710

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 27th day of May, 2021, a true and correct copy of this document was served on plaintiff and all registered counsel of record via the Court's ECF system.

/s/ Nolan J. Mitchell
Nolan J. Mitchell